

November 14.2002

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Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, N.W.  
Washington, D.C. 20544

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**In the Matter of: RBOC Payphone Coalition Petition for Rulemaking to Establish Revised Per-Call Payphone Compensation Rate and American Public Communications Council Request to Update Default Compensation Rate for Dial-Around Calls from Payphones (RM No. 10568)**

Dear Ms. Dortch:

On behalf of the Government Issues Policy Committee of the Enterprise Networking Technologies Users Association (ENTUA), we write to oppose the RBOC Payphone Coalition and the APCC Petitions for Rulemaking to establish increased per-call payphone compensation rates. ENTUA is an independent association comprised of AT&T customers, focused on partnering with AT&T to drive information exchange and operational capabilities to meet the network technology needs of the business community.

The payphone surcharge, currently \$0.24, would increase over 100% if this petition were granted. IXC's pass this surcharge through to business customers and would pass any increases along as well. What this would create is a situation where business customers are paying \$0.20 for an average toll-free call but an additional \$0.50 in fixed charges to cover the IXC's payphone compensation obligation.

We believe a rate set above what the toll-free market will bear will tend to increase the downward spiral of payphone originated calls. We will have to take into consideration blocking toll-free calls from payphones if the rate is increased above what our companies can tolerate as an expense to do business. This will require consumers to use alternate access methods (like cell phones), more frequently, which will, ironically, negatively impact the payphone providers that this rate increase is intended to help.

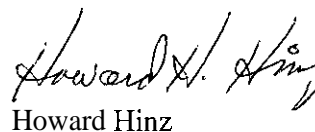
The bottom line is that toll-free business customers should not be put in the position of shouldering the financial burden of a failing payphone industry. As the number of calls made from payphones continues to decline the methodology that the FCC has enacted can only lead to higher per-call surcharges. This is not an effective economic model and disproportionately hurts business customers like us, who are paying this ever-increasing cost.

We thank you for your consideration

Sincerely,

  
Jane Ford

  
Donn Greiner

  
Howard Hinz

  
Fred Koester

  
Jeanne Malone

cc: Mr. William Maher  
Mr. Jeffery Carlisle

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